

1 RENE L. VALLADARES
2 Federal Public Defender
Nevada State Bar No. 11479
3 BRIAN PUGH
Assistant Federal Public Defender
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
5 Brian_Pugh@fd.org
6 Attorney for Karen Chapon

7 **UNITED STATES DISTRICT COURT**
8
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 KAREN CHAPON,
14 Defendant.

Case No. 2:20-cr-00286-JCM-NJK

**STIPULATION TO EXTEND
MOTION DEADLINES**
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, and Jessica Oliva, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Brian Pugh,
19 Assistant Federal Public Defender, counsel for Karen Chapon:

20 IT IS STIPULATED AND AGREED that the parties herein shall have to and including
21 July 21, 2023, to file any and all pretrial motions and notices of defense.

22 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
23 shall have to and including August 4, 2023, to file any and all responsive pleadings.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
25 shall have to and including August 11, 2023, to file any and all replies to dispositive motions.

1 The Stipulation is entered into for the following reasons:

2 1. The parties are attempting to negotiate a resolution of the case without the need
3 for trial or pretrial motions. The parties need a short continuance of the motion deadlines to
4 continue negotiations; however, the defendant needs to maintain her right to file pretrial
5 motions in the event the negotiations are unsuccessful.

6 2. The defendant is not incarcerated and does not object to the continuance.

7 3. The parties agree to the continuance.

8 4. The additional time requested herein is not sought for purposes of delay, but
9 merely to allow counsel for defendant sufficient time within which to be able to effectively
10 complete investigation of the discovery materials provided and to adequately consult with
11 defendant in order to determine whether the case will ultimately go to trial or be resolved
12 through a guilty plea.

13 This is the first stipulation to continue filed herein.

14 DATED this 6th day of July, 2023.

15 RENE L. VALLADARES
16 Federal Public Defender

17 By /s/ Brian Pugh

18 BRIAN PUGH
Assistant Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Jessica Oliva

JESSICA OLIVA
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
KAREN CHAPON,
Defendant.

Case No. 2:20-cr-00286-JCM-NJK

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties are attempting to negotiate a resolution of the case without the need for trial or pretrial motions. The parties need a short continuance of the motion deadlines to continue negotiations; however, the defendant needs to maintain her right to file pretrial motions in the event the negotiations are unsuccessful.

2. The defendant is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively complete investigation of the discovery materials provided and to adequately consult with defendant in order to determine whether the case will ultimately go to trial or be resolved through a guilty plea.

1 **CONCLUSIONS OF LAW**

2 The ends of justice served by granting said continuance outweigh the best interest of the
3 public and the defendant in a speedy trial, since the failure to grant said continuance would be
4 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the
5 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into
6 account the exercise of due diligence.

7
8 The continuance sought herein is excludable under the Speedy Trial Act, Title 18,
9 United States Code, Section 3161(h)(1)(D) and Section § 3161 (h)(7)(A), when considering
10 factors under Title 18, United States Code, § 3161(h)(7)(B)(i),(iv).

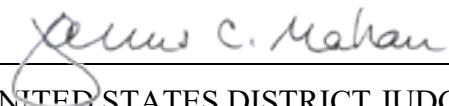
11 **ORDER**

12
13 IT IS THEREFORE ORDERED that the parties herein shall have to and including July
14 21, 2023, to file any and all pretrial motions and notices of defense.

15 IT IS FURTHER ORDERED that the parties herein shall have to and including August
16 4, 2023, to file any and all responsive pleadings.

17 IT IS FURTHER ORDERED that the parties herein shall have to and including August
18 11, 2023, to file any and all replies to dispositive motions.

19 DATED July 10, 2023.

20 
21 _____
22 UNITED STATES DISTRICT JUDGE